

Remarks:

This amendment is submitted in an earnest effort to advance this case to issue without delay. The examiner has indicated that the case contains allowable subject matter.

Claim 25 has been amended to clarify that the flowpath through the rotor is for well fluids. Claim 13 has been amended to clarify that the pump serves for moving well fluids through the inner tube that holds the rotor. In addition this amendment makes claims 4, 7, 8, 9, 12, and 13 depend from claim 25 instead of from claim 26, as none of these claims relied on the structure recited in claim 26.

The main reference cited against this case, US 4,687,054 of Russell does not show a rotor. Instead Russell has a linearly effective and moving motor core. This type of structure is not hard to adapt to axial through-flow of well fluids whereas it is unknown to pump well fluids through a rotating motor core. The instant invention clearly recites a "rotor" and there is no such structure in Russell. Therefore the rejection on Russell is defective.


Going further, US 3,631,275 of Conrad and US 3,135,884 of Luenberger both relate to lubricant systems, not to systems that pump well fluids through the tool-driving motor. Well fluids are

normally moved in massive volumes, and contain particles and solvents; they cannot be compared to a coolant or lubricant. These references therefore do not anticipate the instant invention in any meaningful way and add nothing to the teachings of Russell to suggest pumping well fluids through a rotor of a coaxial motor.

For these reasons all the claims in the case are clearly in condition for allowance. Notice to that effect is earnestly solicited.

If only minor problems that could be corrected by means of a telephone conference stand in the way of allowance of this case, the examiner is invited to call the undersigned to make the necessary corrections.

Respectfully submitted,
K.F. Ross P.C.



by: Andrew Wilford, 26,597
Attorney for Applicant

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5683 Riverdale Avenue Box 900
Bronx, NY 10471-0900
Cust. No.: 535
Tel: 718 884-6600
Fax: 718 601-1099
Email: email@kfrpc.com

Enclosure: None.